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September 18, 2023

**By ECF**

Hon. Michael A. Hammer, U.S.M.J.  
United States District Court  
for the District of New Jersey  
50 Walnut Street  
Newark, NJ 07102

**RE: *Industria de Alimentos Zenú S.A.S. v. Latinfood U.S. Corp. d/b/a Zenú Prods. Co., et al.,***  
**Civ. Action No. 2:16-cv-6576-KM-MAH**

Dear Judge Hammer:

We represent Plaintiff Industria de Alimentos Zenú S.A.S. in the above-captioned action. Pursuant to the Amended Scheduling Order dated July 9, 2023, ECF No. 301, Plaintiff's damages expert report is due on September 27, 2023 with Defendants' responding expert report due on November 10, 2023. The completion of all expert discovery is scheduled for December 6, 2023. Plaintiff respectfully requests to an extension of 45 days for the first and third deadlines and 60 days for the second deadline. Plaintiff's expert report would then be due on November 13, 2023, Defendants' responding report would be due on January 11, 2024, and expert discovery would be completed by February 26, 2024.

In October 2020, Plaintiff had designated Wayne Hoeberlein as its damages expert, *see* ECF No. 206. However, when Plaintiff attempted to contact Mr. Hoeberlein to start working on the report, Plaintiff was informed that Mr. Hoeberlein retired. Plaintiff thus requires the additional time to identify a replacement expert and prepare its report. Defendants consent to an extension of the expert discovery deadlines.

We thank the Court for its attention to this matter.

Respectfully,

/s/ Samuel Kadosh

SK:jv

cc: Mark J. Ingber, Esq.